

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:25-cv-391**

JOSHUA STOW, SHARONE BUNN,
AND TIARA LOFTON, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

ACTIVEHOURS, INC. d/b/a EARNIN,

Defendant.

NOTICE OF SPECIAL APPEARANCE

Pursuant to Local Rule 83.1(d), please take notice of the special appearance of Randolph T. Chen of Migliaccio & Rathod LLP as counsel of record for Plaintiffs in this action. I certify I am an active member in good standing of the District of Columbia Bar.

I am appearing in association with Troy D. Shelton of Dowling PLLC, who is an active member in good standing of the bar of this Court.

Respectfully submitted,

Dated: June 17, 2025

By: /s/ Randolph T. Chen

Randolph T. Chen
Migliaccio & Rathod LLP
412 H St. NE, Suite 302
Washington D.C., 20002
Telephone: (202) 470-3520
Fax: (202) 800-2730
rchen@classlawdc.com

Attorney for Plaintiffs